

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Southern Division)

UNITED STATES OF AMERICA

*

VS.

*

CASE NO. TDC 19-030

NOAH HARRIS

*

CONSENT MOTION TO CONTINUE SENTENCING HEARING

The Defendant by and through his attorney, Robert C. Bonsib, respectfully requests this Honorable Court to continue the Sentencing Hearing in the above captioned matter and, as reasons therefore, states as follows:

1. The Defendant has entered a plea of guilty in the above captioned matter, an offense relating to his receipt, distribution and possession of child pornography. Sentencing is presently set for October 7, 2019 at 2:00 p.m.

2. The Defendant is a member of the Jewish faith and the current scheduled sentencing date conflicts with the Defendant and his family's religious obligations. Because the Defendant resides in Florida, to attend the current scheduled sentencing hearing the Defendant and his family would need to make travel arrangements that would conflict with the required date of religious observance.

3. The Defendant is respectfully requesting that this Honorable Court continue the sentencing hearing in the above captioned matter.

4. Undersigned counsel has contacted Assistant United States Attorney Timothy Hagan who has authorized the undersigned to represent that the government does not oppose this request. Subject to the Court's calendar, the government, the Defendant and undersigned counsel would be available on October 11, 2019 for sentencing in this matter.

WHEREFORE it is respectfully requested that this Honorable Court grant the relief prayed.

Respectfully submitted,

/s/ Robert C. Bonsib

ROBERT C. BONSIB, ESQ.
6411 Ivy Lane, Suite 116
Greenbelt, Maryland 20770
(301) 441-3000
robertbonsib@marcusbonsib.com
Trial Bar No. 00324

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was sent via ECF this 19th day of August, 2019 to Assistant United States Attorney Timothy Hagan, Office of the United States Attorney, 6500 Cherrywood Lane, Greenbelt, MD 20770.

/s/ Robert C. Bonsib

ROBERT C. BONSIB